



Linda Vandeloop
Director-
Federal Regulatory

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October 15, 2012

Electronic Submission

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Portals II, Room TW-A325
Washington, DC 20554

RE: Amendment of Parts 1 and 22 of the Commission's Rules with Regard to the Cellular Service, Including Changes in Licensing of Unserved Areas; Amendment of the Commission's Rules with Regard to Relocation of Part 24 to Part 27; Interim Restrictions and Procedures for Cellular Service Applications, WT Docket No. 12-40, RM No. 11510

Dear Ms. Dortch:

On October 11, 2012, AT&T representatives Kimberly King, Jeanine Poltronieri, Mike Roden, (by telephone) Robert Vitanza (by telephone) and the undersigned met with John Leibovitz, Deputy Chief, Wireless Telecommunications Bureau, and Roger Noel, Lloyd Coward, Keith Harper, Brian Regan, Nina Shafran, and Denise Walter from the Mobility Division to discuss the next steps in the cellular license rule NPRM. AT&T discussed its concerns about the NPRM proposal to issue geographic overlay licenses through competitive bidding with the overlay licensee being granted rights to serve all unserved areas and any area the incumbent later stops serving. AT&T explained that its biggest concern from a legal perspective is with the reversionary rights granted to the overlay licensee rather than the auctioning of the unserved area per se. AT&T also discussed other concerns involving operational issues, particularly the interference potential and additional coordination requirements as additional licensees are added through the overlay auction process. AT&T agreed to do further analysis and to examine other options and get back to the FCC with any additional thoughts.

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In accordance with section 1.1206(b)(2) of the Commission's rules, this letter is being filed electronically with your office. Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script, reading "Linda S. Bondeloo". The signature is written in dark ink and is positioned below the word "Sincerely,".

Cc: John Leibovitz
Roger Noel
Lloyd Coward
Keith Harper
Brian Regan
Nina Shafran
Denise Walter